

This proposal is quite similar to the ARRL proposal, and shares much of what is wrong with the ARRL proposal. It should be noted that this proposal does not unanimously reflect the ideas of all NCVEC members.

The numbered comments below refer to specific paragraphs in the NCVEC proposal.

17. Creation of new entry-level license. Unnecessary and a bad idea. Many people acquire a technician-class license simply to use VHF and UHF and remain Technicians for life. The Technician license is a valid and useful entry-level license. Recommend denial.

18. Technical restrictions. No restrictions are required if the Technician class is left as-is. Applicants are adequately tested on electrical and RF Safety concepts. I will make additional comments under 19 and 20 below. Recommend denial.

19. Basic Framework. Again, if paragraphs 17 and 18 are denied, this section is superfluous. However, certain provisions deserve comment. The power, electrical, and technical restrictions discussed in sections 19 (d - f) are not only a bad idea, they are unenforceable.

If these limits are being proposed because the new question pool discussed in section 20 will eliminate considerations of electrical and RF safety, then the proposed limits are an especially bad idea. Transceivers are commonly available that exceed the proposed power limit, even FM mobile radios are generally available in the 55 to 75 watt class. If a licensee has not been required to learn and demonstrate proficiency in basic safety concepts, then they will not know why they should keep power below certain limits. In addition, commonly available gain antennas can increase the ERP of these stations to well over the levels at which near-field radiation safety is a concern, yet there is no discussion of ERP in the proposed limitations. Recommend denial.

20. Examination requirements. An abbreviated entry-level examination is unnecessary. The Element 2 examination is not an impediment to achieving an amateur license; I have taught Fifth graders who have gained their licenses. An entry-level examination should require familiarity with FCC rules, basic operating procedures, international treaty requirements (because even at UHF, licensees will be allowed to communicate internationally in the satellite sub-bands) and should especially cover concepts of station setup, electrical safety, and RF safety. The current Element 2 question pool adequately covers this material, and the current 35-question format includes questions on each element.

In addition, the requirement for entry-level licensees to keep a copy of Part 97 rules "available at all times" is silly and is an inadequate substitute for demonstrating working knowledge of Part 97 in an examination session. Does this mean that mobile operators need to have a copy in the glove compartment of their vehicles? Portable operators who use an HT need to have a special pocket-sized version carried on their person? I believe the FCC can clearly see the enforcement problems that might be associated with this provision. Recommend Denial.

21. No comment.

22. If the Communicator Class license proposal is denied, this section is superfluous.

23. Adjustments of Existing HF assignments. Although this section is somewhat obviated by the FCC's proposed actions in Docket 04-140, I support the reassignments proposed here. In particular, the adjustment of the phone portion to 7100 KHz brings the US more in line with other countries than the ARRL's proposed limit of 7125 KHz.

24. Existing Novice Class licensees should be given lifetime Element 1 credit, and should be given 5 years to either upgrade to General by passing Element 3 or should be downgraded to Technician if they fail to take or pass Element 3. I recommend denial of this paragraph as it is written.

25. Existing Technician Plus licensees should be given lifetime Element 1 credit, and should remain in the Technician Class unless and until they pass Element 3. The Element 2 examination that they passed did not adequately cover principles of operation on HF, which is sufficiently different from VHF/UHF that it should require additional testing. Recommend denial of this paragraph as written.

26. Support, in its entirety.

27. The Novice, Technician Plus, and Advanced classes should be retired, except for the lifetime Element 1 credit discussed above. The Technician license should be retained as the entry-level license. Recommend denial as written.

28. Morse Code Requirement. I support the elimination of Element 1 as a requirement to hold a General Class license because there is no longer an international requirement for Morse Code as a condition of HF usage. However, it should be retained as a requirement for the Extra-Class license, which is the highest state of the Amateur Service. The Extra Class serves as the reservoir of knowledge from which less-experienced amateurs are "mentored. This reservoir of knowledge will be partially empty without basic Morse Code proficiency. I recommend denial of this paragraph as written.

29-33. No comment.

In conclusion, there is much more wrong with this proposal than there is right about it. I recommend denial of the proposal.

Because none of the recent submittals regarding restructuring is perfect, it may fall on the FCC to develop a sensible restructuring proposal. At minimum, and possibly at maximum, it should include the following:

- Retention of a VHF/UHF-only license as an entry level or to provide access to VHF/UHF spectrum to amateurs who do not require more. Examinations for such a license do not need to be simplified; they should adequately emphasize familiarity with the rules, basic operating principles, station setup, basic electrical principles, and above all, radiation and electrical safety.

- Retention of the Element 3 examination as a requirement to operate in the HF portion of the spectrum.

- Elimination of unused license classes (Technician Plus, Novice, Advanced) by retention of credit for elements passed and upgrading or downgrading licensees to existing license classes as appropriate.

- Retention of Element 1 testing to achieve the Extra Class license, the highest-level license in the Amateur Service.